

FILED

**IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA EASTERN DIVISION**

2025 JUL 21 A 9:40

Candace Alexander,

Plaintiff

U.S. DISTRICT COURT
N.D. OF ALABAMA
LCN

v.

Jameka Scales, Corey Bennett, Patrick Bennett, and Vickie Bennett,

Defendants

Civil Action No. 1:25-cv-00980-CLM

LITIGATION ACTIVITY SUMMARY MEMORANDUM

FROM JULY 17, 18, AND 21, 2025

COMES NOW the Plaintiff, Candace Alexander, and respectfully submits this Summary to assist the Court in reviewing Plaintiff's filings submitted between July 17 and July 21, 2025, in response to the Defendants' Motion for Extension of Time and associated procedural and factual representations.

This Summary groups the filings by category and date of submission for the Court's convenience.

I. Initial Procedural Filings (July 17, 2025)

- **Notice of Non-Opposition to Defendants' Extension Request**

Clarifies Plaintiff's non-opposition to the requested extension through August 10, 2025, while noting that the Motion itself constitutes a waiver of any future service challenges under Rule 12(h)(1).

- **MOTION to Preclude Improper Reference to Non-Party Witness**

Clarifies to the court and the defendants that there is only one Plaintiff.

II. Clarifications on Service and Representation (July 18, 2025)

- **Early Motion Discovery Framework**

Establishes the groundwork for early discovery boundaries, evidence preservation, and outlines limitations on contact or procedural gamesmanship.

III. Clarifications on Geographic Access and Individual Participation (July 21, 2025)

- **Notice Regarding Clarification of Service Timeline and Defendant Filings**

Provides a chronological account of mailing, tracking, and USPS confirmations. Establishes that all Defendants were served, and that Corey Bennett personally retrieved his documents from the post office (see Exhibit T).

- **Plaintiff's Motion to Strike Any Future Challenge to Service of Process**

Filed pursuant to Rule 12(h)(1)(A), this motion asks the Court to bar any future objections to service given Defendants' failure to raise such objections in their first responsive filing.

- **Notice Regarding Defendants' Service and Waiver of Objection**

Further clarifies the procedural timeline, reiterating that no Defendant objected to service in the initial responsive filing.

- **Supplemental Notice of Filing Exhibit T**

Provides proof that Defendant Corey Bennett retrieved the summons packet in person, undermining any implication of improper or incomplete service.

Other defendants also received their packets and signed for them via USPS certified service.

- **Notice Regarding Defendants' Statement on Geographic Distance From Court**

Counters Defendants' claim that none of them reside near the Court by showing that Defendant Jameka Scales resides in Harvest, AL, well within the Court's jurisdiction.

- **Notice Regarding Lack of Evidence of Consent to Representation by Defendant Corey Bennett**

Highlights Corey Bennett's repeated use of plural language and unauthorized representation of co-defendants and even the Plaintiff herself, without consent or legal basis.

- **Plaintiff's Motion to Require Separate Answers from Each Defendant**

Requests that the Court direct each Defendant to submit an individual responsive pleading and not allow collective answers or representation.

- **Notice Regarding Absence of Service on Plaintiff**

Confirms that although Plaintiff was not personally served with the Defendants' Motion for Extension, she accessed the filing via PACER and responded in good faith.

- **Notice of Relationship Clarification**

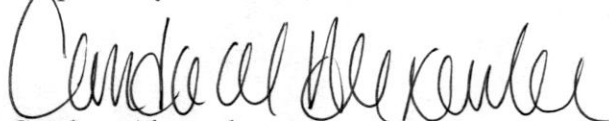
Clarifies the relationship between the Plaintiff and the Defendants

Summary Purpose

This Summary is submitted solely to assist the Court in contextualizing the grouped nature of Plaintiff's recent filings and to reaffirm the following procedural positions:

- Defendants' Motion for Extension constitutes a **waiver of any objection to service** under Rule 12(h)(1).
- Corey Bennett's actions reflect **unauthorized collective representation**, including for the Plaintiff herself.
- Service was conducted in good faith with tracking confirmations, and Defendants have not rebutted that fact with specific objections or affidavits.

Respectfully submitted,



Candace Alexander

7415 Nature Walk Way SE

Owens Cross Roads, AL 35763

Pro Se Plaintiff